

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EDGE CAPTURE L.L.C., and EDGE)	
SPECIALISTS, L.L.C.,)	
)	
Plaintiffs,)	Civil Action No. 09 CV 1521
)	
v.)	JURY TRIAL DEMANDED
)	
BARCLAYS BANK PLC, BARCLAYS)	
CAPITAL INC., UBS AG, UBS)	Judge Charles R. Norgle, Sr.
FINANCIAL SERVICES INC., UBS)	
SECURITIES LLC, WOLVERINE)	Magistrate Judge Denlow
TRADING, L.L.C., AND WOLVERINE)	
EXECUTION SERVICES, L.L.C.,)	
)	
Defendants.)	
)	

**THE BARCLAYS AND UBS DEFENDANTS' MOTION
TO PREVENT DISCLOSURE OF THEIR CONFIDENTIAL INFORMATION
TO DR. ISRAEL NELKEN**

Defendants Barclays Bank PLC and Barclays Capital Inc. (collectively, "Barclays"), and UBS AG, UBS Financial Services Inc., and UBS Securities LLC (collectively, "UBS"), respectfully move the Court for an order preventing Plaintiffs Edge Capture L.L.C. and Edge Specialists, L.L.C. (collectively, "Edge") from disclosing Barclays' and UBS's confidential information to Edge's expert, Dr. Israel Nelken.

The potential for significant, irreversible harm to Barclays and UBS if their confidential information is inadvertently disclosed to a competitor and/or used to develop competing applications greatly outweighs any minor inconvenience to Edge of having to select another expert at this early stage (before Edge has even served its initial infringement contentions) or rely on its four other designated experts. Therefore, good cause exists to prevent the disclosure of the Barclays and UBS defendants' confidential information.

This Motion is based upon this Motion, the attached Notice of Motion and Memorandum of Law, Declaration of Jeffrey G. Randall and attached Exhibits, the papers and pleadings on file in this action, and such other and further evidence as may subsequently be presented to the Court.

Respectfully submitted,

Dated: September 22, 2011

By: _____ /s/ *Jeffrey G. Randall* _____

Jeffrey G. Randall (admitted *pro hac vice*)
Jeffrey D. Comeau (admitted *pro hac vice*)
PAUL HASTINGS LLP
1117 S. California Avenue
Palo Alto, CA 94304-1106
Tel: (650) 320-1800

Allan M. Soobert (admitted *pro hac vice*)
PAUL HASTINGS LLP
875 15th Street, N.W.
Washington, DC 20005
Tel: (202) 551-1700

Emily Newhouse Dillingham
PAUL HASTINGS LLP
191 N. Wacker Drive
Chicago, IL 60606
Tel: (312) 499 6292

Attorneys for Defendants Barclays Bank PLC, Barclays Capital Inc., UBS AG, UBS Financial Services Inc., and UBS Securities LLC

CERTIFICATE OF SERVICE

I, Jeffrey G. Randall, hereby certify that on September 22, 2011, I caused a true and correct copy of The Barclays and UBS Defendants' Motion to Prevent Disclosure of Their Confidential Information to Dr. Israel Nelken to be served by electronic filing using the CM/ECF system upon:

Anthony Beasley
agbeasley@rkmc.com

Sang A. Young Brodie
sybrodie@rkmc.com, mjlarson@rkmc.com, mmtacheny@rkmc.com

Patrick G. Burns
pburns@gbclaw.net, docket@gbclaw.net

Miles A. Finn
mafinn@rkmc.com

Justin R. Gaudio
jgaudio@gbclaw.net

Deanna Keysor
deanna.keysor@kayescholer.com

Michelle K. Marek
michelle.marek@kayescholer.com

Munir R. Meghjee
mrmeghjee@rkmc.com, ljlewis@rkmc.com, jkcornelius@rkmc.com

Seth A. Nielsen
sanielsen@rkmc.com

Gavin James OKeefe
gokeefe@gbclaw.net

Ronald Schutz
rjschutz@rkmc.com

Robert W. Unikel
Robert.unikel@kayescholer.com; maondil@kayescholer.com

Dated: September 22, 2011

By: /s/ Jeffrey G. Randall